



Director's Office

Douglas A. Ducey, Governor
John S. Halikowski, Director
Scott Omer, Deputy Director for Operations
Kevin Biesty, Deputy Director for Policy
Dallas Hammit, Deputy Director for Transportation

July 7, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: ET Docket No. 13-49, Comments of Arizona Department of Transportation to Refresh the Record on Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band

Dear Secretary Dortch:

The Arizona Department of Transportation (ADOT) urges the Federal Communications Commission's (FCC) to preserve the 5.9 GHz band and its channelization as designed for Dedicated Short Range Communications (DSRC) applications that have been in development of over a decade. Any sharing of this protocol has to work around what is currently being deployed as well as what is planned to be deployed for DSRC applications. Thorough testing must be completed to determine whether any change in the protocol is safe before sharing implementation.

Proposals that call for re-channelization of the 5.9 GHz band will set back the future of traffic safety several years and cost hundreds of millions of dollars in wasted research, development and investment. The Arizona Department of Transportation in partnership with the Maricopa County Department of Transportation and the University of Arizona is currently working on projects that utilize this band width in cutting edge technologies for Vehicle-to-Infrastructure (V2I). The projects are designed to increase public safety and are well underway at this time.

DSRC technology has moved from research and testing to initial deployments. The auto industry and the U.S. Department of Transportation (DOT) have conducted extensive research showing the significant safety benefits of Vehicle-to-Vehicle (V2V) and have established the best ways for vehicles on the road to exchange and impart information, and the best way for V2V to operate in the field.

Therefore, the FCC must protect 5.9 GHz and its current channel plan to capitalize on all the investment (both private and government), research, development, and testing. Re-channelization of the 5.9 GHz band would nullify the investments already made and delay DSRC's benefits by several years. Sharing of the spectrum should not be allowed unless it can be positively demonstrated that it will not interfere with or negatively affect the safety of life functions of the spectrum.

ADOT supports sharing technologies only if it can be proven safe and without interference with the safety of life functions of DSRC across all channels in the 5.9 GHz band according to the current channel plan.

Sincerely,



John S. Halikowski
ADOT Director